

**ABELSON & TRUESDALE, LLC**

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Attorney for Debtor

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

In Re: HARLAN & ANN TUCKMAN

Debtors.

Case No. 10-14607 (RTL)

Chapter 13

**MOTION TO  
TO ENFORCE AUTOMATIC STAY;  
AND DAMAGES PER 11 USC 362 (k)**

Hearing Date: **September 6, 2011  
10:00 A.M.**

To: Clerk, United States Bankruptcy Court  
United States Bankruptcy Court  
402 East State Street  
Trenton, New Jersey 08608

Albert Russo, Trustee  
CN 4853  
Trenton, NJ 08650

Lee Myles Auto Group LLC  
847 Fern Avenue  
Reading, PA 19607  
*Attention: Officer, Director,  
Managing Agent or Other Individual  
Authorized to Accept Service of Process*

LEE MYLES ASSOCIATES CORP. and/or  
LEE MYLES AUTO GROUP LLC  
PO BOX 10  
Reading, PA 19607  
*Attention: Officer, Director, Managing Agent  
or Other Individual Authorized to Accept  
Service of Process*

Bunce Atkinson, Esq.  
Atkinson & DeBartolo  
The Galleria  
Red Bank, NJ 07701  
Chapter 7 Trustee for Aantrans Inc. under  
Case # 11- 18185 (RTL)

**PLEASE TAKE NOTICE** that on September 6, 2011 at 9:00 in the forenoon, or as soon as counsel may be heard, the undersigned attorney for the Debtor, Harlan & Ann

Tuckman will move before the UNITED STATES BANKRUPTCY COURT, Honorable Raymond T. Lyons, presiding, 402 E. State Street, TRENTON, NEW JERSEY, 08608 for an Order to enforce the provisions of 11 U.S.C. § 362(a) and fees and costs per 11 U.S.C. § 362(k) for the wilful violation of same; and compelling creditor to immediately terminate collection of pre-petition debts under the Debtor's franchise agreement.

**PLEASE TAKE FURTHER NOTICE** that Debtor shall rely upon the attached certification in support of the application and that pursuant to Local Rule 9013-1, it is submitted that no brief is necessary as issues presented are clear and concise, oral argument is not requested and a proposed form of order is submitted herewith.

/s/ Steven J. Abelson  
STEVEN J. ABELSON, ESQ.  
Attorney for Debtor

Dated: August 8, 2011